

REMARK

Upon entry of the present amendment, various of the claims will have been amended and others of the claims will have been canceled. No new claims will have been submitted for consideration by the Examiner. In particular, claim 1 will have been amended to incorporate therein the substantive recitations of dependent claim 15 and the respective intervening claims. Independent claims 19 and 20 will have been amended in a similar fashion. Accordingly, the various dependent claims, the recitations of which have now been incorporated into the respective independent claims 1 and 20 will have been canceled without prejudice or disclaimer of the subject matter thereof.

In view of the herein contained amendments and remarks, Applicants respectfully request reconsideration and withdrawal of each of the outstanding rejections together with an indication of the allowability of all of the claims pending herein, in due course. Such action is now believed to be appropriate and proper and is thus respectfully requested.

Initially, Applicants note that the Examiner has not objected to the drawings filed in the present application. Nevertheless, Applicants respectfully request the examiner explicitly indicate his acceptance of the drawings filed in the present application concurrently with the filing thereof.

Applicants additionally note that the present application claims the benefit of an early effective filing date under 35 USC 119, based upon the filing of Japanese patent application number 2003-033014, that was filed on February 10, 2003. Applicants additionally note that a claim for priority as well as a certified copy of the above noted Japanese priority document were filed concurrently with the filing of the present application on February 9, 2004.

Accordingly, Applicants respectfully request that the Examiner, in the next official communication in the present application, acknowledge Applicants' claim for foreign priority and confirm that the certified copy of the Japanese priority document, upon which the above noted claim for foreign priority is based, has been received in the United States Patent and Trademark Office.

Applicants respectfully thank the Examiner for considering the document submitted together with the Information Disclosure Statement of May 13, 2004 by the return of an appropriately annotated copy of the PTO 1449 form attached to the above noted Information Disclosure Statement.

In the outstanding official action, the Examiner rejected claims 1-18 under 35 USC 101. The Examiner asserted that the claimed invention is directed to non-statutory subject matter. In particular, the Examiner asserted that the claims should positively recite another statutory class or positively recite the subject matter that is being transformed.

By the present response, and without in any manner acquiescing in the propriety of the Examiner's rejection, Applicants have amended claim 1 to explicitly recite that the recited method is performed by a computer. Accordingly, Applicants submit that claim 1, and those claims dependent thereon clearly define and are directed to statutory subject matter and an indication to such effect is respectfully requested, in due course.

In the outstanding official action, the Examiner rejected all of claims 1-38 under 35 USC 103(a) is being unpatentable over "A Spreadsheet Modeling Approach to the Holt-Winters Optimal Forecasting" by SEGURA et al.

Applicants respectfully traverse the above noted rejection and submit that the cited reference does not disclose the combination of features recited in each of Applicants independent claims. In particular, Applicants respectfully submit that the disclosure of the SEGURA et al document is inadequate and insufficient to teach, disclose, suggest or render obvious the particular combinations of features recited in each of Applicants' claims.

In particular, SEGURA et al relates to determining optimal forecasting for the Holt-Winters exponential smoothing model. A spreadsheet model is utilized to solve the nonlinear programming problem so as to achieve optimization efficiently. Nevertheless, SEGURA et al does not disclose a distribution system where customers and factories are related by a single delivery center with the details as recited in Applicants' pending claims. Further, SEGURA et al does not relate to managing production quantity or to determining expectations of an assembly quantity at a factory.

The present invention manages production quantity so as to enable the reduction of inventories and the shortening of lead times in a distribution system where customers and factories are related to each other via a single delivery center. In particular, according to the recitations of the claims pending in the present application, the expected assembly quantities of the factory for various production cycles are defined. Specifically, for the $(t + 2)$ -th cycle, the expected assembly quantity of the at least one factory is based on the standard inventory quantity of the single delivery center for the next cycle, the expected shipment quantity of the single delivery center for the previous cycle, the expected shipment quantity of the single delivery center for the current cycle, the actual inventory quantity of the single delivery center for the end of the current cycle, the determined shipment quantity of the at least one factory for the previous

cycle and a shipment quantity of the at least one factory for a cycle prior to the previous cycle, as now recited in each of the pending independent claims.

The above noted features, in the various claim combinations, is not disclosed or rendered obvious by the disclosure of the SEGURA et al publication relied upon by the Examiner. Accordingly, Applicants respectfully request the Examiner reconsider and withdraw the outstanding rejection applied against the presently pending claims and indicate the allowability thereof, in due course.

SUMMARY AND CONCLUSION

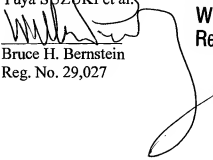
Applicants have made a sincere effort to place the present application in condition for allowance and believe that they have now done so. Applicants have amended the claims in order to eliminate the basis for the Examiner's rejection thereof under 35 USC 101. Applicants have additionally amended the claims to more clearly define the features of the present invention and with respect to such amended claims, have pointed out the significant and substantial features that are not disclosed by the reference relied upon by the Examiner. Applicants have additionally pointed out the explicit recitations of the pending claims and with respect to such recitations, have directed the Examiner's attention to the shortcomings of the relied upon reference.

Accordingly, Applicants have provided a clear and convincing evidentiary basis supporting the patentability of all of the claims pending in the present application and respectfully request an indication to such effect, in due course.

Any amendments to the claims which have been made in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attached thereto.

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully Submitted,
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